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February 26, 2015

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capital Heights, MD 20753

DOCKET FILE COPY ORIGINAL

**RE: EB Docket No. 06-36, 2014 CPNI Certification Filing for NetZero Wireless, Inc.**

Dear Ms. Dortch:

Enclosed for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009(e) submitted on behalf of NetZero Wireless, Inc.

Any questions you may have regarding this filing should be directed to my attention at 818-287-3542 or via email to [jberges@corp.unttd.com](mailto:jberges@corp.unttd.com).

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeanne Berges', is written over the typed name and title. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeanne Berges  
VP, Corporate Counsel

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ANNUAL 47 C.F.R. SECTION 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER  
PROPRITARY NETWORK INFORMATION ("CPNI") COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015: Covering calendar year 2014  
Name of company covered by this certification: NetZero Wireless, Inc.  
Form 499 Filer ID: 830458  
Name of signatory: Edward Zinser  
Title of signatory: EVP, Chief Financial Officer

1. I, Edward Zinser, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. Section 64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings, instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. Section 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement actions.

  
\_\_\_\_\_  
Edward Zinser, EVP & Chief Financial Officer

2-25-15  
\_\_\_\_\_

Date

**Attachments:** Accompanying Statement explaining CPNI procedures

## **NetZero Wireless, Inc. Statement of CPNI Procedures and Compliance**

### **Use of CPNI**

NetZero Wireless, Inc. ("NZ") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. NZ has trained its personnel not to use CPNI for marketing purposes. Should NZ elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

NZ does have CPNI, including detail information concerning calls made using NZ's services. However, this information is not made available to customers over the telephone or in person. Online access to account information is protected as described below.

### **PROTECTION OF CPNI**

NZ has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The company maintains a CPNI Manual and trains its employees regarding procedures for protecting CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. NZ will respond in writing to the authorized customer representative at the address of record. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure procedures are being followed.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

NZ does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authorization procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

### **DISCLOSURE OF CPNI ONLINE**

NZ has instituted authentication procedures to safeguard the disclosure of CPNI online. NZ's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. NZ authenticates customers by username and password. All customers are required to establish a password without the use of readily available biographical information or account information if they want to have online access to their CNPI. Unless the appropriate password is provided, NZ does not allow online access to CPNI.



NZ has established back-up authentication procedures for lost or stolen passwords. Company's back-up authentication procedure operates by offering a challenge question and consumer generated answer.

NZ has put into place procedures to notify customers whenever a Customer Service Agent has made a change to the consumer's account information. Notice of the change is sent via email to the email address on file.

#### **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

NZ does not have any retail locations and therefore does not disclose CPNI in-store.

#### **NOTIFICATION TO LAW ENFORCEMENT**

NZ has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

#### **ACTIONS AGAINST DATA BROKERS**

NZ has not taken any actions against data brokers in the last year.

#### **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

NZ did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2014.

#### **INFORMATION ABOUT PRETEXTERS**

NZ has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI. NZ does not disclose CPNI over the telephone.